

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

Leslie C. Heilman, Esquire  
Laurel D. Roglen, Esquire  
**BALLARD SPAHR LLP**  
919 N. Market Street, 11th Floor  
Wilmington, DE 19801  
Telephone: (302) 252-4465  
E-mail: heilmanl@ballardspahr.com  
roglenl@ballardspahr.com

Ivan M. Gold, Esquire  
**ALLEN MATKINS LECK GAMBLE**  
**MALLORY & NATSIS LLP**  
Three Embarcadero Center, 12th Floor  
San Francisco, CA 94111  
Telephone: (415) 837-1515  
E-mail: igold@allenmatkins.com

*Counsel for Agua Mansa Commerce Phase I, LLC,  
210 Development, LLC, GC Ambassador  
Courtyard, LLC, MGP XII Magnolia, LLC, and PF  
Portfolio 2, LP*

In Re:

BED BATH & BEYOND INC, *et al.*<sup>1</sup>

Debtor.

Case No.: 23-13359 (VFP)

Chapter 11

Judge Vincent F. Papalia

(Jointly Administered)

<sup>1</sup> The last four digits of Debtor Bed Bath & Beyond Inc.'s tax identification number are 0488. A complete list of the Debtors in these Chapter 11 Cases and each such Debtor's tax identification number may be obtained on the website of the Debtors' proposed claims and noticing agent at <https://restructuring.ra.kroll.com/bbby>. The location of Debtor Bed Bath & Beyond Inc.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 650 Liberty Avenue, Union, New Jersey 07083.

**APPLICATION OF IVAN M. GOLD  
FOR ADMISSION *PRO HAC VICE***

Pursuant to Rule 9010-1 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey (the “Local Rules”), Agua Mansa Commerce Phase I, LLC, 210 Development, LLC, GC Ambassador Courtyard, LLC, MGP XII Magnolia, LLC, and PF Portfolio 2, LP (collectively, the “Landlords”), by and through the undersigned counsel, respectfully move this Court for entry of an Order granting Ivan M. Gold permission to appear *pro hac vice* as counsel on behalf of the Landlords in the above-captioned case and all matters arising therein or related thereto.

Annexed hereto as Exhibit A is a Declaration of Attorney Gold, which conforms to Local Rule 9010-1(b).

Unless requested by other parties, no oral argument is requested.

A proposed form of order is submitted herewith.

WHEREFORE, the Landlords respectfully request that the Court grant this Application and enter the proposed Order submitted herewith.

Dated: May 16, 2023

/s/ Leslie C. Heilman  
Leslie C. Heilman, Esquire  
BALLARD SPAHR LLP  
919 N. Market Street, 11th Floor  
Wilmington, DE 19801  
Telephone: (302) 252-4465  
Facsimile: (302) 252-4466  
Email: heilmanl@ballardspahr.com

## **EXHIBIT A**

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

Leslie C. Heilman, Esquire  
Laurel D. Roglen, Esquire  
**BALLARD SPAHR LLP**  
919 N. Market Street, 11th Floor  
Wilmington, DE 19801  
Telephone: (302) 252-4465  
E-mail: heilmanl@ballardspahr.com  
roglenl@ballardspahr.com

Ivan M. Gold  
**ALLEN MATKINS LECK GAMBLE**  
**MALLORY & NATSIS LLP**  
Three Embarcadero Center, 12th Floor  
San Francisco, CA 94111  
Telephone: (415) 837-1515  
E-mail: igold@allenmatkins.com

*Counsel for Agua Mansa Commerce Phase I, LLC,  
210 Development, LLC, GC Ambassador  
Courtyard, LLC, MGP XII Magnolia, LLC, and PF  
Portfolio 2, LP*

In Re:

BED BATH & BEYOND INC, *et al.*<sup>1</sup>

Debtor.

Case No.: 23-13359 (VFP)

Chapter 11

Judge Vincent F. Papalia

(Jointly Administered)

<sup>1</sup> The last four digits of Debtor Bed Bath & Beyond Inc.'s tax identification number are 0488. A complete list of the Debtors in these Chapter 11 Cases and each such Debtor's tax identification number may be obtained on the website of the Debtors' proposed claims and noticing agent at <https://restructuring.ra.kroll.com/bbby>. The location of Debtor Bed Bath & Beyond Inc.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 650 Liberty Avenue, Union, New Jersey 07083.

**CERTIFICATION OF IVAN M. GOLD**  
**IN SUPPORT OF APPLICATION FOR ADMISSION *PRO HAC VICE***

Ivan M. Gold hereby certifies, pursuant to 28 U.S.C. § 1746, as follows:

1. I am of counsel at the law firm of Allen Matkins Leck Gamble Mallory & Natsis LLP. My office is located at Three Embarcadero Center, 12th Floor, San Francisco, California 94111.

2. I was admitted to practice law in the State of California in 1985. In addition, I am admitted to practice before the following courts:

U.S. District Court for the Central District of California

U.S. District Court for the Eastern District of California

U.S. District Court for the Northern District of California

U.S. District Court for the Southern District of California

U.S. District Court for the Eastern District of Michigan

3. I am a member in good standing of the Bar in every jurisdiction in which I am admitted to practice.

4. I have never been suspended or disbarred from the practice of law. There are no disciplinary proceedings pending against me in any jurisdiction, and no discipline has previously been imposed on me in any jurisdiction.

5. I have obtained a copy of the Local Rules of this Court and am generally familiar with such Rules.

6. I agree to be bound by the Rules of this Court upon my admission.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: May 16, 2023

/s/ Ivan M. Gold  
Ivan M. Gold, Esquire  
ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP  
Three Embarcadero Center, 12th Floor  
San Francisco, CA 94111  
Telephone: (415) 837-1515  
Facsimile: (415) 837-1516  
E-mail: igold@allenmatkins.com